

1 Ali Zamani  
2 Alireza Zamanizadeh  
3 613 SW Elderbrook Pl  
4 Portland Or 97225  
(503) 422-31071

5  
6 UNITED STATE DISTRICT COURT  
DISTRICT OF OREGON, PORTLAND DIVISION

7  
8 ANGELA TORRES, an Individual )

9 Plaintiff, )

Case No: 3:17-CV-01270-AC

10 Defendants Motion for  
Summary Judgment  
11 Rule 56.

12 Aliiireza Zamanizadeh, aka Ali Zamani )  
13 An Individual, Adult care search a )  
Alireza Zamanizadeh), a a foreign non- )  
14 Profit corporation )

15  
16 Now Comes the defendants Ali Zamani Personally and as director of Adult Care Search, Inc. file  
17 Their Motion for the Summary Judgment or Partial Summary Judgment per Fed. Rule 56.,  
18 before this court on this 23<sup>rd</sup> Day of March, 2022 against the plaintiff on the above caption case.  
19 Defendants' Motion for Summary Judgment or Partial Summary Judgment is brought in front  
20 Of this court based on the Defendants Second Claim For Relief, Defendants Affirmative  
21 Defense, Defendants' Second Affirmative Defense ( Contributory Negligence), Defendants'  
22 Fourth Affirmative Defense ( Estoppel/Wavier), Defendants' Fifth Affirmative Defense (Failure  
23 to Mitigate) and Defendant Sixth Affirmative Defense (Unclean Hand). Defendants hereby  
24 states the following in support of their motion herein:  
25  
26

Defendants Motion for Summary Judgment (Page (1) of (7))

## BACK GROUND

(1)

On or about June 16, 2016, Plaintiff without any notice to the defendants, executes a Quite Claim Deed to defendants company Adult Care Search, Inc. a nonprofit company in order to Hide her assets from her husband in divorce court proceeding. Plaintiff Forged the Defendant Ali Zamani director of the Adult care Search in the Real Estate Excise Tax form, a form required by Clark county Law for transfer of any property to another person.

Later Plaintiff Mailed the .

(2)

Plaintiff Knowing forged the defendants signature on the Transfer of the property on the Excise Tax, knowing plaintiff violated a criminal act by forging defendant Signature.

(3)

Plaintiff Also executed a (first Power of attorney to defendants authorizing the defendant without defendants knowledge whatsoever.

(4)

Plaintiff, on or about February 20, 2017, files a complaint through her first attorney David Richardson, CONFIRMING that she had executed the Quite Claim Deed for transferring the Property located at 779 W Chesnut St, Washougal, Washington, [Plaintiff Complaint General allegation Paragraph (9) line 6 of plaintiff complaint} attached herein as Exhibit (1) is the copy of the Plaintiffs complaint and Defendants' Answer, Affirmative Defense and Counter claims).

## FACTS.

State Of Washington (County of Clark) Law requires for the transfer of any real estate property Either as gift or Sales or property, beside the Quite Claim form that signature and acceptance of both seller and buyer or Guarantee and Guarantor is required on all Forms specially the EXCISE



1  
2  
3 TAX AFFIDAVIT for the transfer of the deed to another person. The Guarantor/Seller Must  
4 sign the Form and Buyer/Guarantee MUST personally Sign as his or hers acceptance of the  
5 transfer of the Property.  
6

7 (5)

8 Plaintiff knowing and willfully knowing that defendant did not know nor had any knowledge of  
9 Plaintiff's action and in order plaintiff to establish a ground for her to bring the claim against the  
10 defendants 'for defendants refusal to participate in a relationship, forged the signature and  
11 knowingly and willfully committed the crime in forging defendants signature on the EXCISE  
12 TAX AFFIDAVIT form, to establish a ground for her complaint ( case herein listed above in  
13 caption). Attached at Exhibit NO (2) is the copy of the emails between defendants attorney  
14 and Plaintiff's attorney and copy of the Excise Tax affidavit with forged signature.  
15

16 (6)

17 Plaintiff caused and contributed to creating a circumstances to allow the plaintiff to bring action  
18 against defendants whom she forged his signature. Attached herein as exhibit (1) is the plaintiff  
19 complaint.  
20

## 21 ARGUMENT

22 (7)

23 Plaintiff in her own complaint confirms that she executed the Quit Claim and Excise Tax  
24 Affidavit that has never been disputed neither by herself nor by her representative in this case.  
25 By not disputing and confirming the act of the forgery on the Excise Tax Affidavit plaintiff has  
26 unconditionally confirms her intent as well as her motives and further by filing the complaint

(8)

Defendants Motion for Summary Judgment (Page (3) of (7))

1  
2 Plaintiff act of forgery on the Excise Tax Affidavit which the governmental instrument  
3  
4 requirement by the State of Washington county of Clark, has contributed over 50% if not 100%  
5 in to create cause to bring the action against the defendants. Defendant action is undisputed by  
6 her own confirmation and proof in her complaint filed against the defendants for plaintiff  
7 wrongful intend and cause for he bases of this complaint.

8 (9)

9  
10 Plaintiff omitting and forging defendants name and defendants signature on the forged Excise  
11 Tax Affidavit is the 100% bases of the this complaint. The Law should and does require any  
12 action brought upon or initiated based on false statement and specially forged document should  
13 be dismissed and sanction should be applied against the party whom wrongfully and willfully  
14 forged and committed a criminal act and contributed in creating such a action against another.

15 (10)

16  
17 Plaintiff without forging the signature of the defendant could not have caused this action against  
18 The defendants in all its claim, she omitted all transfer by herself without any knowledge of the  
19 Defendants, plaintiff omitted all her action knowingly and had the opportunity not to omit such  
20 Transfers pf nay of the elements stated in her action.

21 (11)

22  
23 Plaintiff caused every action listed in her complaint on her own and by herself and by her  
24 own willingness to do so in order to cause reason and bases to creat action against the  
25 defendants.

26 (12)

Plaintiff by her omitting the fault to create action against the defendant has waived all her rights.



1 to bring any action whatsoever if such action created a cause for her complaint and are bases for  
2 her complaint against the defendants.  
3

4 (13)

5 Plaintiff forging signature and creating the bases for her claim, confirms and attest to her unclean  
6 hand by law in establishing and filing her claim against the defendants. Any action brought  
7 against another party when the moving party has hands in creating should be dismissed.  
8

9 Defendants' move the court for an order dismissing this case in all plaintiffs actions based on the  
10 Undisputed facts plaintiff by her own statements in her complaints bringing the claim seeking  
11 Remedy on a claim caused by plaintiff, for transferring the deed by forging defendants signature  
12 documents required by Washington state law in transferring the deed of ownership against  
13 defendant should be dismissed.  
14

15 Furthermore, plaintiff wrong intent by forging signature and causing ground for any action  
16 against the defendant should be dismissed.  
17

18 (14)

19 Plaintiff further have lied several time to the FBI in order to create criminal case against the  
20 defendant Ali Zamani in order to use the Do Process to win in the civil action filed wrong fully  
21 and established based on forgery by plaintiff.  
22

23 (15)

24 Plaintiff and defendants have accepted this court as the ruling authority on the merit and all  
25 Motions brought in this case. Therefore this court has the authority to rule for an order of  
26 dismissal of the case in whole as well as the dismissal of the Temporary Restraining Order against  
the company that has no involvement in this case and the only reason the Temporary order was

1 issued against the defendants' company, "Careoptioncom, Inc" not involved in any shape or  
2 form which the only reason the temporary restraining order against this company was issued  
3 was that the defendant's attorney did not attend the hearing and an order was issued.  
4

5 **Defendant hereby pray for the court for an order :**

- 6 1. dismissing all Plaintiffs claims which has been brought up against defendants.
- 7 2. An order Dismissing and removal of the temporary Restraining order against the  
8 Defendants Company and its bank Acareoptioncom, Inc, bank account at Chase Bank.
- 9 3. An order terminating the Temporary Restraining Order Against The Bank account of  
10 Adult care search, Inc. at Chase bank.
- 11 4. For an order for all cost and damages to be determined by the court against the plaintiff  
12 for plaintiff forging and committing criminal act to create and establish the ground for  
13 filing this action against the defendants.
- 14 5. For an Order against the Plaintiff for all damages brought to defendants' company  
15 adult care search for not being able to operate for past four (4) years and loss of business.
- 16 6. For an order against Plaintiff Using the and falsifying statement with Us Department of  
17 Justice and causing criminal action against the defendant Ali Zamani and damages  
18 brought by plaintiff falsified statement.
- 19 7. For and order for time loss and business loss.
- 20
- 21
- 22

23 Respectfully submitted on the 23<sup>rd</sup> of March, 2022.



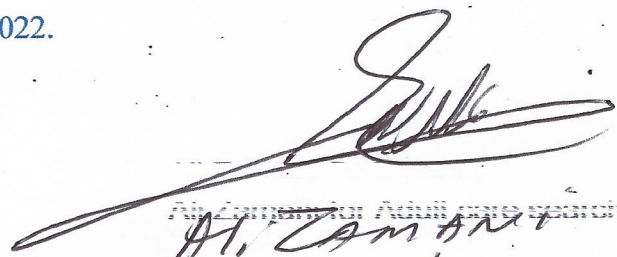
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- 22

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25  
26



Ali Zamani for Adult care search  
Defendant  
Adultcare Search, Inc.

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3  
4 Ali Zamani  
5 Alireza Zamanizadeh  
6 613 SW Elderbrook Pl  
7 Portland Or 97225  
8 (503) 422-31071

9 UNITED STATE DISTRICT COURT  
10 DISTRICT OF OREGON, PORTLAND DIVISION

11 ANGELA TORRES, an Individual )

12 Plaintiff, )

Case No: 3:17-CV-01270-AC

13 Defendants Ali zamani Declaration  
14 In support of Defendants Motion for  
15 Summary Judgment

16 Aliireza Zamanizadeh, aka Ali Zamani  
17 An Individual, Adult care search a  
18 Alireza Zamanizadeh), a a foreign non-  
19 Profit corporation )

20 I, ali Zamani defendant in the above captioned case hereby submit my declaration in support of  
21 the defendants motion for summary judgment. And I hereby state the following;

22 That I meet the plaintiff on or aout April Mar of 2016 and I had no previous knowledge of her.

23 That on a night I was out with friends the plaintiff kept approaching me and introduced herself  
24 to me while she was accompanied with another lady known as Stephanie.

25 That I had no knowledge when she forged my signature for transferring of her property o 77( W  
26 Chesnut St Washugal.

That She never discussed nor she had any authorization from me to sign on my behalf



1  
2 That I never authorized her to sign anything on my behalf.

3 That I was unaware as her transferring her property to me or to my company.

4 That I only was informed when I received an envelope in my resident which contained the Deed  
5 of Trust and the power of attorney.

6  
7 That I immediately contacted her and asked about the mail I received,.

8 That she informed me that she wanted to help my organization in the cause and she had donated  
9 her property.

10 That I Objected to her action.

11 That I and my company had several time offered to returned the property and never received any  
12 acceptance from her or her attorney on the case.

13 That, While I was attempting to return the property and her donations, she filed a complaint  
14 against me and my company.

15  
16 That Through my attorneys I found out that she had lied to the FBI in order to create a claim  
17 against me in order to win in her civil matter.

18 That She never had any nor discussed any regarding signing on my behalf on any document.

19 That I only was and became aware when through my attorney tried to return and deed the  
20 property back to her that found out she had forged my signature on the transfer of the property to  
21 my company.

22  
23 That, Upon attempting to transfer the property I and my attorney found out that Excise Tax  
24 Affidavit must be signed by the receiver or guarantee.

25 That it was then when My attorney informed me that my signature was forged on the tax excise  
26 Affidavit by Plaintiff Angela and confirmed by her attorney since we could not transfer the  
property back to her unless she signed on the Tax Excise affidavit which her attorney send the

1 copy of the forged document to my attorney.

2 That, I intend to file a criminal case against the Plaintiff for forging my signature.

3 I respectfully Submit This Declaration in support of he Defendants Motion for Summary  
4 Judgment.  
5

6 Submitted on this 23<sup>rd</sup> of March 2022.  
7

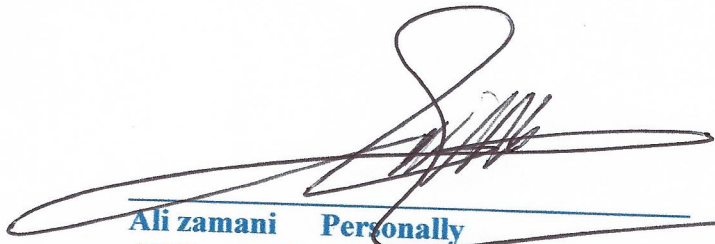
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11 Ali Zamani Defendant  
12 Adult care Search, Inc.  
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**CERTIFICATE OF SERVICE**

**I CERTIFY THE FOREGOING Defendant's Adult Care Search and Ali Zamani's defendant Motion for Summary Judgment and Defendants Declaration, complete copies of the originals thereof on this 23th<sup>th</sup> day of March, 2022 served the foregoing on to Plaintiffs attorney Mr. Nicholas J, Henderson to the address listed below by Fax and by US mail on to :**

**Nicholas J Henderson  
Motschenbacher & Blattner LLP  
117 SW Taylor Street Suite 300  
Portland OR 97204  
Fax (503) 417-0528  
nhenderson@portlandlaw.com**

  
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